

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,	Case No. 23-00623 (TJC)
Debtors.	Jointly Administered
	Objection Deadline: August 20th, 2024, at 4:00 pm (CT)

**SUMMARY OF FOURTH FEE APPLICATION OF DAY RETTIG MARTIN, P.C. AS COUNSEL TO THE OFFICIAL COMMITTEE OF PENSIONERS FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM FEBRUARY 1, 2024, THROUGH FEBRUARY 29, 2024**

Name of Applicant:	<u>Day Rettig Martin, P.C.</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Pensioners</u>
Date of Retention:	<u>November 4, 2023</u>
Date of Order Authorizing Retention:	<u>November 13, 2023, Doc. 506</u>
Period for which Compensation and Reimbursement is Sought:	<u>February 1, 2024, through February 29, 2024</u>
Amount of Compensation Sought as Actual, Reasonable and Necessary:	<u>\$24,960.00 (80% of \$31,200.00)</u>
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	<u>\$36.18</u>
Application Type:	<u>Monthly</u>

SUMMARY OF DAY RETTIG MARTIN, P.C. APPLICATIONS FOR COMPENSATION

Application	Date Filed	Period Covered	Requested Fees	Requested Expenses	Fees & Expenses Paid to Date
First	04/15/24	11/04/23 – 11/30/23	\$20,544.00 (80% of 25,680.00)	\$0.00	\$20,544.00
Second	04/15/24	12/01/23 – 12/31/23	\$16,902.00 (80% of 21,127.50)	\$70.74	\$16,972.74

Third	05/28/24	01/01/24 – 01/31/24	\$20,682.00 (80% of 25,852.50)	\$0.00	\$20,682.00
Fourth	08/06/24	02/01/24 – 02/29/24	\$24,960.00 (80% of \$31,200.00)	\$36.18	\$0.00

**SUMMARY OF BILLING BY PROFESSIONALS
FEBRUARY 1, 2024 – FEBRUARY 29, 2024**

Name of Professional	Position, Department, Year of Bar Admission	Hourly Billing Rate	Total Billed Hours	Total Compensation
Paula L. Roby	Shareholder, Bankruptcy Bar Admission: 1999	\$375.00	83.30	\$24,840.00 (80% of \$31,050.00)
Julie G. Quist	Paralegal	\$150.00	1.0	\$120.00 (80% of \$150.00)
TOTALS:			84.3	\$24,960.00 (80% of \$31,200.00)

**COMPENSATION BY PROJECT CATEGORY
FEBRUARY 1, 2024 – FEBRUARY 29, 2024**

Project Category	Total Hours	Total Fees
A. Asset Analysis and Recovery	0.0	\$0.00
B. Case Administration	16.2	\$5,850.00
C. Court Hearings	3.3	\$1,237.50
D. Employment and Fee Applications	0.0	\$0.00
E. Litigation	0.0	\$0.00
F. Litigation Planning	0.0	\$0.00
G. Meetings and Communications with Professionals	49.5	\$18,562.50
H. Pension Analysis	1.6	\$600.00
I. Plan and Disclosures Statement	2.6	\$975.00
J. Review Pleadings	10.1	\$3,787.50
K. Other Contested Matters	0.0	\$0.00

L. Travel (billed at 50%)	1.0	\$187.50
TOTALS:	84.3	\$31,200.00

EXPENSE SUMMARY
FEBRUARY 1, 2024 – FEBRUARY 29, 2024

Expense Category	Service Provider (if applicable)	Total Expenses
Travel: Cedar Rapids – Iowa City	roundtrip mileage	\$36.18
TOTALS:	0.00	\$36.18

Day Rettig Martin, P.C. (the “Applicant” or “DRM”), counsel to the Official Committee of Pensioners (the “Pensioners Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby applies (the “Application”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s *Order Establishing Procedures for Interim Compensation And Reimbursement of Expenses of Professionals* (Doc. 224) (the “Interim Compensation Order”), for allowance of compensation for services rendered and reimbursement of expenses for the period from **February 1, 2024** through **February 29, 2024** (the “Application Period”), and respectfully represents as follows:

1. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b).
2. Venue of the Chapter 11 Case and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.
3. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and the Interim Compensation Order.

BACKGROUND

A. Formation of the Official Committee of Pensioners

4. On August 7, 2023, (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”) commencing these bankruptcy cases.

5. On September 13, 2023, Paula L. Roby of DRM appeared for a group of Mercy Pensioners (Doc. 212) and on October 4, 2023, for the Mercy Pensioners Ad-Hoc Committee (Doc. 332).

6. On October 18, 2023, counsel for the Mercy Pensioners Ad-Hoc Committee filed a Motion to Establish an Official Committee of Pensioners Under 11 U.S.C. § 1102 (a)(2) (Doc. 385). A hearing on the Motion was held October 27, 2023, and the Motion was granted November 3, 2023 (Doc. 451). The following day, eight members of the Mercy Pensioners Ad-Hoc Committee were appointed to serve as the Official Committee of Pensioners (the “Pensioners Committee”) (Doc. 458).

B. The Retention of Day Rettig Martin, P.C.

7. On November 8, 2023, the Pensioners Committee applied to the Court (Doc. 479) (the “DRM Application”) for an order authorizing it to retain and employ DRM as their counsel, effective as of November 4, 2023. On November 13, 2023, the Court entered an order authorizing such retention (Doc. 506).

RELIEF REQUESTED

8. All services for which compensation is requested were performed for or on behalf of the Pensioners’ Committee. During the compensation period, DRM received no payment and no promises of payment from any source other than the Debtors for services to be rendered in any

capacity in connection with the matters covered by this Application. There is no agreement or understanding between DRM and any other person, other than members of DRM for sharing of any compensation to be received for services rendered in the Chapter 11 Case.

9. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, DRM is seeking compensation in the amount of \$24,960.00, which is equal to eighty percent (80%) of the \$31,200.00 in fees for professional services rendered by DRM during the Application Period. This amount is derived solely from the applicable hourly billing rates of DRM's personnel who rendered services to the Pensioners. In addition, DRM incurred \$36.18 in out-of-pocket expenses during the Application Period.

A. Compensation Requested

10. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by DRM with respect to the Chapter 11 Case during the Application Period. This detailed itemization complies with the Interim Compensation Order and the Bankruptcy Code in that each time entry contains a separate time allotment, a description of the type of activity, and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

11. The attorney(s) and paraprofessional(s) who rendered services related to each project category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

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B. Expense Reimbursement

12. DRM incurred out-of-pocket expenses during the Application Period in the amount of \$36.18. Descriptions of the expenses actually occurred are identified in **Exhibit A** in relation to each project category. The expenses are broken down into categories of charges.

13. DRM provided a wide array of legal services to the Pensioners Committee. The services rendered by DRM are separated by project category and are more fully described in the Summary of Services by Project spreadsheet attached to this Application as **Exhibit B**.

CONCLUSION

14. DRM believes that the time entries, rates, and expenses included in **Exhibit A** are reasonable, customary, and in compliance with the requirements of the Bankruptcy Code and the Interim Compensation Order.

15. DRM reserves the right to correct, amend, or supplement this Application, including, without limitation, to seek payment in the event this Application is not approved in full.

WHEREFORE, DRM respectfully requests that the Court enter an order: (i) awarding DRM allowance of (a) eighty percent (80%) of the fees for the Application Period in the amount of \$24,960.00; and (b) the reimbursement of one-hundred percent (100%) of the actual and necessary expenses DRM incurred during the Application Period in the amount of \$36.18; (ii) authorizing and directing the Debtors to pay DRM \$24,960.00, representing the total amount owed for the Application Period; and (iii) granting such other relief as is just and proper.

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Dated: August 6, 2024

Respectfully submitted,
DAY RETTIG MARTIN, P.C.

/s/ Paula L. Roby

Paula L. Roby AT0006749

Telephone: (319) 365-0437

FAX: (319) 365-5866

E-mail: paula@drpjlaw.com

ATTORNEY FOR THE

OFFICIAL COMMITTEE OF PENSIONERS

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this August 6, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Julie G. Quist

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Day Rettig Martin, P.C.

150 1st Avenue NE Suite 415
P. O. Box 2877
Cedar Rapids IA 52406-2877

Phone: 319-365-0437 Fax: 319-365-5866

Mercy Pensioners Committee

Statement Date: August 6, 2024

Statement No. 123460

Account No. 100082.01

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Fees

			Rate	Hours	
02/01/2024	PLR	Receive and review Notice of Hearing on Cash Collateral Motion.	375.00	0.30	112.50
	PLR	Continue Plan discussions with Attorney Roy Leaf.	375.00	0.50	187.50
	PLR	Legal Research regarding feasibility of "Two Trust Solution" advanced by Unsecured Creditors' Committee.	375.00	2.10	787.50
	PLR	Attention to practical impediments to "Two Trust Solution".	375.00	0.70	262.50
	PLR	Telephone Conference with Nathan Coco regarding same.	375.00	0.40	150.00
02/02/2024	PLR	Telephone call with Marc Ross regarding status.	375.00	0.80	300.00
	PLR	Receive and review update from Marc Ross regarding Financial Advisor call.	375.00	0.20	75.00
	PLR	Meet with Attorney Andrew Sherman regarding Plan negotiations.	375.00	0.50	187.50
	PLR	Receive and review Motion for Relief of Stay requesting distribution from Sale Proceeds.	375.00	0.50	187.50
	PLR	Receive and review Motion for Sale of JV Property.	375.00	0.30	112.50
	PLR	Receive and review Marc Ross calculations spreadsheet.	375.00	0.30	112.50
	PLR	Receive and review Claims Register Detail, attention to total Unsecured Creditors' Committee Claims.	375.00	1.40	525.00
	PLR	Telephone conference with Marc Ross regarding same.	375.00	0.40	150.00
02/05/2024	PLR	Receive and review Calculations regarding potential annuity from October Three annuities.	375.00	0.60	225.00
	PLR	Receive and review Application to Employ.	375.00	0.10	37.50
02/06/2024	PLR	Telephone call with Marc Ross regarding Pension claim and e-mail from Attorney Daniel Simon.	375.00	1.00	375.00
	PLR	Continue Plan discussions.	375.00	1.00	375.00
	PLR	Call with Debtors and Bondholders regarding Plan negotiations.	375.00	0.50	187.50
	PLR	Telephone conference with Roy Gainer regarding Unsecured Creditors' Committee and Pension Committee communication, interplay.	375.00	0.40	150.00
	PLR	Legal Research regarding PBGC.	375.00	1.70	637.50
	PLR	E-mail correspondence with Pensioner Committee regarding status, pending actions.	375.00	0.80	300.00
02/07/2024	PLR	Telephone call with Marc Ross regarding Pension claims.	375.00	0.80	300.00

Statement Date: 08/06/2024
Statement No. 123460
Account No. 100082.0

Mercy Pensioners Committee

			Rate	Hours	
	PLR	Attend Hearing on Motion for Entry of Order Authorizing Distribution of Proceeds for Sale of Debtors Assets.	375.00	1.00	375.00
	PLR	Prepare for meeting with Marc Ross.	375.00	1.40	525.00
02/08/2024	PLR	Preparation for Pensioners Committee meeting; discuss Pension Plan options.	375.00	3.90	1,462.50
	PLR	Telephone and e-mail correspondence with Marc Ross regarding Plan treatment; phone call with Altigro regarding same.	375.00	0.80	300.00
	PLR	Receive and review Summary and detail of current Pension assets held by Debtors.	375.00	0.50	187.50
	PLR	Telephone conference with Marc Ross regarding Summary and detail of Current Pensioner assets held by Debtors.	375.00	0.40	150.00
	PLR	Receive and review Witness and Exhibit List for 02/22/24 hearing filed by Parties.	375.00	0.70	262.50
	PLR	Call with Attorneys for Unsecured Creditors' Committee regarding status, exchange of information.	375.00	0.60	225.00
	PLR	Follow up telephone conference with Marc Ross regarding status, exchange of information.	375.00	0.30	112.50
	PLR	Receive and review Summary of fees being charged to Pension Trust.	375.00	0.30	112.50
02/09/2024	JGQ	Prepare documents for Attorney Paula Roby's meetings with Marc Ross and Official Pensioners Committee.	150.00	0.20	30.00
	PLR	Travel to Iowa City for meeting with Pensioners Committee and Marc Ross. (Half rate)	187.50	0.50	93.75
	PLR	Travel back to Cedar Rapids from meeting with Pensioners Committee and Marc Ross. (Half rate)	187.50	0.50	93.75
	PLR	Meet with Financial Advisor Marc Ross regarding analysis of available pension funds for Plan discussions and prepare for Pensioners Committee Meeting.	375.00	2.10	787.50
	PLR	In-person meeting with Pensioners Committee and Marc Ross.	375.00	1.50	562.50
	PLR	Attention to Pensioner correspondence regarding Pension Plan and Amendments.	375.00	0.40	150.00
	PLR	Work with committee on update to all Pensioners on case status and road ahead.	375.00	0.60	225.00
	PLR	Review annuity calculations and continuing plan administration estimates.	375.00	0.80	300.00
	PLR	Prepare memorandum regarding annuity calculations and continuing plan administration estimates.	375.00	1.70	637.50
02/11/2024	PLR	Correspond with Marc Ross regarding Bondholder's Plan.	375.00	0.60	225.00
	PLR	Review Bondholder's draft Plan.	375.00	2.60	975.00
	PLR	E-mail correspondence with Attorney Daniel Simon, (408FRE).	375.00	0.20	75.00
	PLR	Review proposed term sheet sent by Attorney Daniel Simon.	375.00	0.40	150.00
	PLR	Worked on proposed revisions of proposed term sheet sent by Attorney Daniel Simon.	375.00	0.40	150.00
	PLR	E-mail correspondence with Marc Ross regarding funding estimates for Pension Plan.	375.00	0.40	150.00
	PLR	Telephone call with Attorney Nathan Coco regarding term sheet.	375.00	0.40	150.00
	PLR	Telephone conference with Bondholders Attorney Nathan Coco and Megan Pruesker regarding Bondholders proposed plan and waterfall.	375.00	0.50	187.50

Statement Date: 08/06/2024
Statement No. 123460
Account No. 100082.0

Mercy Pensioners Committee

			Rate	Hours	
02/12/2024	PLR	Receive and review Proceeding Memo and Order on Motion to Extend Exclusivity Period and Administrative Claims Bar Date Motion.	375.00	0.30	112.50
	PLR	Receive and review update from Marc Ross regarding Financial Advisor call.	375.00	0.20	75.00
	PLR	Attend Hearing on Motion to Extend Exclusivity Period and Administrative Claims Bar Date Motion.	375.00	1.50	562.50
	PLR	Telephone call with Marc Ross regarding Plan and settlement options.	375.00	0.30	112.50
02/13/2024	PLR	Telephone call with Marc Ross regarding Pension Plan recovery scenarios.	375.00	0.30	112.50
	PLR	Work on potential Pensioner's claim investigation.	375.00	2.20	825.00
	PLR	E-mail correspondence with committee regarding PBGC and avenues for recovery.	375.00	0.60	225.00
	PLR	Receive and review Unsecured Creditors' Committee proposal regarding Pension plan and waterfall.	375.00	0.80	300.00
02/14/2024	PLR	Correspondence with Marc Ross regarding Pension Plan recovery scenarios; newly raised issues.	375.00	0.30	112.50
	PLR	Discussion with Attorney Nathan Coco regarding ongoing Pension Plan discussions.	375.00	0.50	187.50
	PLR	Attention to questions of continuing sponsorship of Church Plan post-effective date, legal research regarding same.	375.00	1.40	525.00
02/15/2024	PLR	Telephone call with Marc Ross regarding potential Pension Plan scenarios.	375.00	0.40	150.00
	PLR	Receive and review update from Marc Ross regarding Financial Advisor Call.	375.00	0.30	112.50
	PLR	Receive and review e-mail correspondence from Nathan Coco regarding Master Trustee fees and expenses, review detail provided regarding same.	375.00	1.20	450.00
	PLR	Review IRS guidelines and caselaw regarding continuing Church Plan Sponsorship	375.00	2.40	900.00
	PLR	E-mail correspondence with Stakeholders with Financial Advisors regarding waterfall various plans.	375.00	0.70	262.50
02/16/2024	PLR	Telephone call with Marc Ross regarding Waterfall Analysis.	375.00	1.30	487.50
	PLR	Review Waterfall Analysis from Bondholders.	375.00	1.10	412.50
	PLR	Receive and review of e-mail correspondence between Peg Brubaker and CBIZ (potential Pension Plan Administrator) and attachments to same	375.00	1.20	450.00
	PLR	Receive and review e-mail from Attorney Emily Keil and attachment (contents protected by FRE 408)	375.00	0.70	262.50
	PLR	Receive and review e-mail from Roy Leaf attaching proposed workers Compensation SIR trust and management order	375.00	0.60	225.00
02/20/2024	JGQ	Receive, review and organize documents from Attorney Emily Keil.	150.00	0.10	15.00
	PLR	Telephone call with Marc Ross regarding Plan options.	375.00	0.50	187.50

Statement Date: 08/06/2024
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Mercy Pensioners Committee

			Rate	Hours	
	PLR	Receive and review Agreed Order Granting Motion for Order Authorizing and Directing the Distribution of Proceeds from the Sale of the Debtors' Assets, Notice of Continuation of Hearing on Final Cash Collateral Order and Exclusivity Motion, and Motion to Continue Hearing On Motion for Entry of an Order Authorizing and Directing the Distribution of Proceeds from the Sale of the Debtors' Assets.	375.00	0.50	187.50
	PLR	Receive and review e-mail from Daniel Simon to UCC regarding Proposed Plan, Request for UCC comments.	375.00	0.10	37.50
	PLR	E-mail correspondence with Stakeholders regarding potential of filing of completing plan.	375.00	0.40	150.00
02/21/2024	JGQ	Draft Motion to Appear Telephonically for 02/22/24 Hearing; send same to Attorney Paula Roby for review; make revisions, finalize and file with Court.	150.00	0.40	60.00
	PLR	Receive and review Support Document for Debtor's Motion for Order Approving the Sale of Interest in Joint Venture.	375.00	0.40	150.00
02/22/2024	PLR	Preparation for cash collateral/ exclusivity hearing	375.00	0.80	300.00
	PLR	Receive and review e-mail with attachments from Roy Leaf regarding sale of JV Progressive Rehabilitation.	375.00	0.50	187.50
02/23/2024	PLR	Receive and review Plan and Disclosure Statement of Debtors, Bar Date Notice, and Expedited Motion to Shorten Time to Between Objection Deadline and Disclosure Statement Hearing.	375.00	2.50	937.50
	PLR	Work on continuing Plan Administration issues including Telephone conference's with potential Administration.	375.00	2.10	787.50
	PLR	E-mail correspondence with Attorney Roy Leaf regarding impact of Administrator on Proposed Plan.	375.00	0.60	225.00
02/26/2024	PLR	Telephone call with Marc Ross regarding status and result of call with Pension Specialist.	375.00	0.30	112.50
	PLR	Meet with Attorney Andrew Sherman regarding ongoing Plan negotiations.	375.00	0.50	187.50
02/27/2024	JGQ	Draft e-mail to Pensioners Committee containing Zoom meeting information.	150.00	0.10	15.00
	JGQ	Prepare documents for Attorney Paula Roby's meeting with Marc Ross and Pensioners Committee.	150.00	0.10	15.00
	JGQ	E-mail Zoom meeting agenda to Carol Ebinger.	150.00	0.10	15.00
	PLR	Meet with Marc Ross regarding status and potential Pensioner recovery under proposed Plan.	375.00	2.10	787.50
	PLR	Receive and review Proceeding Memo and Order regarding Assume/Reject Lease or Executory Contract, Sell/Sale of Property, Order Approving the Sale of the Debtors' Interest in a Joint Venture, and Order Authorizing the Employment of Real Estate Broker.	375.00	0.20	75.00
02/28/2024	PLR	Meet with Marc Ross to strategize on Plan and Admin claim and review Unsecured Creditors Committee's Letter regarding same.	375.00	4.50	1,687.50
	PLR	Telephone call with Attorney Roy Leaf regarding Pension Plan.	375.00	1.20	450.00

Statement Date: 08/06/2024
Statement No. 123460
Account No. 100082.0

Mercy Pensioners Committee

		Rate	Hours	
	PLR Receive and review Order Reducing Period of Time Between Objection Deadline and Disclosure Statement Hearing.	375.00	0.20	75.00
02/29/2024	PLR Meet with Marc Ross to strategize on bankruptcy Plan and collaborate on calculations regarding Plan, and interview potential Administrators.	375.00	6.80	2,550.00
	PLR Telephone conference with Attorney Megan Preusker regarding Pensioners Committee and Bondholders treatment under proposed Plan.	375.00	0.50	187.50
	PLR Participate in Zoom meeting with Pensioners Committee regarding proposed Plan, case updates, and questions.	375.00	1.50	562.50
	For Current Services Rendered		84.30	31,200.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Paula L Roby	1.00	\$187.50	\$187.50
Paula L Roby	82.30	375.00	30,862.50
Julie G. Quist	1.00	150.00	150.00

Advances

02/09/2024	Round trip mileage for Attorney Paula Roby to travel to Iowa City for meeting with Pensioners Committee and Marc Ross.	36.18
	Total Advances	36.18
	Total Current Work	31,236.18
	Previous Balance	\$35,214.00
	Balance Due	<u>\$66,450.18</u>

Please make all checks payable to Day Rettig Martin, P.C. Thank you.

Mercy Pensioners Committee
Feburay 3/31/2024

SUMMARY OF SERVICE BY PROJECT

B. Case Administration

Date	Tmkpr	Time	Amount	Description
02/01/24	PLR	2.1	787.50	Legal Research regarding feasibility of " Two trust Solution" advanced by UCC.
02/01/24	PLR	0.7	262.50	Attention to Practical Impediments to " Two Trust Solution"
02/02/24	PLR	0.3	112.50	Receive and review Marc Ross calculations spreadsheet.
02/06/24	PLR	1.7	637.50	Legal Research regarding PBGC.
02/09/24	JGQ	0.2	30.00	Prepare documents for Attorney Paula Roby's meetings with Marc Ross and Pensioners Committee.
02/09/24	PLR	1.7	637.50	Prepare memorandum regarding annuity calculations and continuing plan administration estimates.
02/11/24	PLR	0.4	150.00	Review proposed term sheet sent by Attorney Daniel Simon.
02/11/24	PLR	0.4	150.00	Worked on proposed revisions of proposed term sheet sent by Attorney Daniel Simon.
02/13/24	PLR	0.8	300.00	Receive and review Unsecured Creditors' Committee proposal regarding Pension plan and waterfall.
02/13/24	PLR	2.2	825.00	Work on potential Pensioner's claim investigation.
02/14/24	PLR	1.4	525.00	Attention to questions of continuning sponsorship of Church Plan post-effective date, legal research regarding same.
02/16/24	PLR	1.1	412.50	Review Waterfall Analysis from Bondholders.
02/21/24	PLR	0.4	150.00	Draft Motion to Appear Telephonically for 02/22/24 Hearing; send same to Attorney Paula Roby for
02/27/24	JGQ	0.1	15.00	Draft e-mail to Pensioners Committee containing Zoom meeting information.
02/27/24	JGQ	0.1	15.00	Prepare documents for Attorney Paula Roby's meeting with Marc Ross andpensioners Comittee.
02/27/24	JGQ	0.1	15.00	E-mail Zoom meeting agenda to Carol Ebinger.
02/07/24	JGQ	1.0	150.00	Attend Hearing on Motion for Entry of Order Authorizing Distribution of Proceeds for Sale of Debtors Assets.
02/12/24	JGQ	1.5	225.00	Attend Hearing on Motion to Extend Exclusivity Period and Administrative Claims Bar Date Motion.
	Totals:	16.2	5,400.00	

C. Court Hearings

Date	Tmkpr	Time	Amount	Description
02/07/24	PLR	1.0	375.00	Attend Hearing on Motion for Entry of Order Authorizing Distribution of Proceeds for Sale of Debtors Assets.
02/12/24	PLR	1.5	562.50	Attend Hearing on Motion to Extend Exclusivity Period and Administrative Claims Bar Date Motion.
02/22/24	PLR	0.8	300.00	Preparation for cash collateral/ exclusivity hearing.
	Totals:	3.3	1,237.50	

G.Meetings and Communications with Proffesionals

Date	Tmkpr	Time	Amount	Description
02/01/24	PLR	0.4	150.00	Telephone Confrence with Nathan Coco regarding same.
02/02/24	PLR	0.8	300.00	Telephone call with Marc Ross regarding status.
02/02/24	PLR	1.0	375.00	Meet with Nate Jones and Alex Moglia regarding Pension.
02/02/24	PLR	0.4	150.00	Telephone confrence with Marc Ross regarding same.
02/06/24	PLR	0.4	150.00	Continue Plan discussions with Attorney Roy Leaf.
02/06/24	PLR	0.5	187.50	Call with Debtors and Bondholders regarding Plan negotiations.
02/06/24	PLR	0.8	300.00	E-mail correspondence with Pensioner Committee regarding status, pending actions.
02/07/24	PLR	0.8	300.00	Telephone call with Marc Ross regarding Pension claims.
02/07/24	PLR	1.4	525.00	Prepare for meeting with Marc Ross.
02/08/24	PLR	3.9	1,462.50	Preparation for Pensioners Committee meeting; discuss Pension Plan options.
02/08/24	PLR	0.8	300.00	Telephone and e-mail correspondence with Marc Ross regarding Plan treatment; phone call with Altigro regarding same.
02/08/24	PLR	0.5	187.50	Meeting with Attorney Andrew Sherman regarding ongoing Plan negotiations.
02/08/24	PLR	0.4	150.00	Telephone conference with Marc Ross regarding Summary and deatail of Current Pensioner assets
02/08/24	PLR	0.6	225.00	Call with Attorneys for Unsecured Creditors' Committee regarding status, exchange of information.

02/08/24	PLR	0.3	112.50	Follow up telephone conference with Marc Ross regarding status, exchange of information
02/09/24	PLR	2.1	787.50	Meet with Financial Advisor Marc Ross regarding analysis of available pension funds for Plan discussions and prepare for Pensioners Committee Meeting.
02/09/24	PLR	1.5	562.50	In-person meeting with Pensioners Committee and Marc Ross.
02/09/24	PLR	0.4	150.00	Attention to Pensioner correspondence regarding Pension Plan and Amendments.
02/09/24	PLR	0.6	225.00	Work with committee on update to all Pensioners on case status and road ahead.
02/11/24	PLR	0.6	225.00	Correspond with Marc Ross regarding Bondholder's Plan.
02/11/24	PLR	0.2	75.00	E-mail correspondence with Attorney Daniel Simon, (408FRE).
02/11/24	PLR	0.4	150.00	E-mail correspondence with Marc Ross regarding funding estimates for Pension Plan.
02/11/24	PLR	0.4	150.00	Telephone call with Attorney Nathan Coco regarding term sheet.
02/12/24	PLR	0.3	112.50	Telephone call with Marc Ross regarding Plan and settlement options.
02/12/24	PLR	0.2	75.00	Receive and review update from Marc Ross regarding Financial Advisor Call.
02/13/24	PLR	0.3	112.50	Telephone call with Marc Ross regarding Pension Plan recovery scenarios.
02/13/24	PLR	0.6	225.00	E-mail correspondence with committee regarding PBGC and avenues for recovery.
02/14/24	PLR	0.3	112.50	Correspondence with Marc Ross regarding Pension Plan recovery scenarios; newly raised issues.
02/14/24	PLR	0.5	187.50	Discussion with Attorney Nathan Coco regarding ongoing Pension Plan discussions.
02/14/24	PLR	0.5	187.50	Telephone conference with Bondholders Attorney Nathan Coco and Megan Pruesker regarding
02/15/24	PLR	0.4	150.00	Correspondence with Marc Ross regarding Pension Plan recovery scenarios; newly raised issues.
02/15/24	PLR	1.0	375.00	Receive and review update from Marc Ross regarding Financial Advisor Call.
02/15/24	PLR	0.7	262.50	E-mail correspondence with Stakeholders with Financial Advisors regarding waterfall various plans.
02/16/24	PLR	0.3	112.50	Receive and review of e-mail correspondence between Peg Brubaker and CBIZ (potential Pension
02/16/24	PLR	0.7	262.50	Receive and review e-mail from Attorney Emily Keil and attachment (contents proected by FRE 408)
02/16/24	PLR	0.6	225.00	Receive and review e-mail from Roy Leaf attaching proposed workers Compensation SIR trust and management order
02/20/24	PLR	0.1	37.50	Receive and review e-mail from Daniel Simon to UCC regarding Proposed Plan, Request for UCC
02/20/24	PLR	0.5	187.50	Telephone call with Marc Ross regarding Plan options.
02/21/24	PLR	0.4	150.00	E-mail correspondence with Stakeholders regarding potential of filing of completing plan.
02/22/24	PLR	0.6	210.42	Receive and review e-mail with attachments from Roy Leaf regarding sale of JV Progressive Rehabilitation.
02/23/24	PLR	0.6	207.90	E-mail correspondence with Attorney Roy Leaf regarding impact of Administrator on Proposed Plan.
02/26/24	PLR	0.5	205.37	Telephone call with Marc Ross regarding status and result of call with Pension Specialist.
02/26/24	PLR	0.5	202.85	Meet with Attorney Andrew Sherman ongoing plan negotiations.
02/27/24	PLR	0.5	200.32	Meet with Marc Ross regarding status and proposed Plan.
02/28/24	PLR	0.5	197.80	Meet with Marc Ross to strategize on bankruptcy Plan and collaborate on calculations regarding Plan.
02/28/24	PLR	0.6	225.00	Telephone call with Attorney Roy Leaf regarding Plan.
02/29/24	PLR	0.5	192.74	Meet with Marc Ross to strategize on bankruptcy Plan and collaborate on calculations regarding
02/29/24	PLR	0.5	190.22	Telephone conference with Attorney Megan Preusker regarding Pensioners Committee and
02/29/24	PLR	0.5	187.69	Participate in Zoom meeting with Pensioners Committee regarding proposed Plan, case updates, and
02/08/24	PLR	0.5	187.50	Meet with Marc Ross to strategize on Plan and Admin claim and review Unsecured Creditors Committee's Letter regarding same.
02/08/24	PLR	0.3	112.50	Receive and review Summary of fees being charged to Pension Trust
02/09/24	PLR	0.8	300.00	Review annuity calculations and continuing plan administration estimates.
02/11/24	PLR	2.6	975.00	Review Bondholder's Plan.
02/01/24	PLR	0.1	37.50	Receive and review Application to Employ.
Totals:		36.3	13,607.81	

H. Pension Analysis

Date	Tmkpr	Time	Amount	Description
02/08/24	PLR	0.3	112.50	Receive and review Notice of Hearing on Cash Collateral Motion.
	PLR	0.5	187.50	Receive and review Motion to Stay requesting distribution from Sale Proceeds.
02/09/24	PLR	0.3	112.50	Receive and review Motion for Sale of JV Property.
	Totals:	1.1	412.50	

I. Plan and Disclosure Statement

Date	Tmkpr	Time	Amount	Description
02/11/24	PLR	2.6	975.00	Review Bondholder's Plan.
	Totals:	2.6	975.00	

J. Review Pleadings

Date	Tmkpr	Time	Amount	Description
02/05/24	PLR	0.6	225.00	Receive and review Calculations regarding potential annuity from October Three annuities.
02/08/24	PLR	0.7	262.50	Receive and review Witness and Exhibit List for 02/22/24 hearing filed by Parties.
02/12/24	PLR	0.3	112.50	Receive and review Proceeding Memo and Order on Motion to Extend Exclusivity Period and
02/15/24	PLR	2.4	900.00	Review IRS guidelines and caselaw regarding continuing Church Plan Sponsorship
02/15/24	PLR	1.2	450.00	Receive and review e-mail correspondence from Nathan Coco regarding Master Trustee fees and
02/15/24	PLR	0.3	112.50	Reviewed update regarding Fincial call on propsoed waterfall in various plans.
02/20/24	PLR	0.5	187.50	Receive and review Agreed Order Granting Motion for Order Authorizing and Directing the
02/21/24	PLR	0.4	150.00	Receive and review Support Document for Debtor's Motion for Order Approving the Sale of Interest in Joint Venture.
02/23/24	PLR	2.1	787.50	Work on continuing Plan Administration issues including Telephone confrence's with potential Administration.
02/23/24	PLR	2.5	937.50	Receive and review Plan and Disclosure Statement of Debtors, Bar Date Notice, and Expedited Motion to Shorten Time Between Objection Deadline and Disclosure Statement Hearing.
02/27/24	PLR	0.2	75.00	Receive and review Proceeding Memo and Order regarding Assume/Reject Lease or Executory Contract, Sell/Sale of Property, Order Approving the Sale of the Debtors' Interest in a Joint Venture,
02/28/24	PLR	0.2	75.00	Receive and review Order Reducing Period of Time Between Objection Deadline and Disclosure Statement Hearing.
02/09/24	PLR	0.5	187.50	Travel to Iowa City for meeting with Pensioners Committee and Marc Ross.
02/09/24	PLR	0.5	187.50	Travel back to Cedar Rapids from meeting with Pensioners Committee and Marc Ross.
	Totals:	12.4	4,650.00	

L. Travel (billed at 50%)

Date	Tmkpr	Time	Amount	Description
02/09/24	PLR	0.5	93.75	Travel to Iowa City for meeting with Pensioners Committee and Marc Ross.
02/09/24	PLR	0.5	93.75	Travel back to Cedar Rapids from meeting with Pensioners Committee and Marc Ross.
	Totals:	1.0	187.50	

	Hrs to Bill	Amount
All:	72.9	26,470.31

Fees 80%	21,176.25
Expenses	0.00

Grand Total:	21,176.25
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